

To: Patrick Kelly[kellyp@api.org]
From: Argyropoulos, Paul
Sent: Mon 9/15/2014 6:15:38 PM
Subject: Re: API Meeting with OMB 2014 RFS.pptx

Thanks Patrick.

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Mobile: Ex. 6 - Personal Privacy



Paul,
Here are the materials I just passed around the table.
Patrick

To: Kaufmann, Robert C.[Robert.Kaufmann@kochps.com]
From: Argyropoulos, Paul
Sent: Tue 8/12/2014 5:29:01 PM
Subject: RE: Argentina Biodiesel

Sure. It might be better to go through this by phone. If you can, give me a ring tomorrow and I can run through this, and the realities and inaccuracies of what is inferred in the article.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Kaufmann, Robert C. [mailto:Robert.Kaufmann@kochps.com]
Sent: Tuesday, August 12, 2014 11:30 AM
To: Argyropoulos, Paul
Subject: Argentina Biodiesel

Paul, you may have seen the article below. Can you shed any light on the application or point me towards a good information source? Thanks for any help!

Grant Kimberley, executive director of the Iowa Biodiesel Board (IBB), talked to U.S. Trade Representative Michael Froman this past weekend about the looming concern he has with possible Argentinian biodiesel imports.

As OPIS reported last week, Froman traveled to Des Moines, Iowa, on Aug. 9, and among other stops, visited the Kimberley Family Farm.

"During Ambassador Froman's tour of the farm where the Kimberleys' raise corn and soybeans on 4,000 acres, [Grant] Kimberley discussed a concerning application made to the Environmental Protection Agency," IBB explained in a press release issued Monday. "Submitted by the trade association representing Argentine biodiesel producers, the organization is asking EPA to approve an 'Alternative Renewable Biomass Tracking Requirement.' If approved, it would in effect replace the stringent feedstock recordkeeping requirements of the RFS regulations and allow Argentine biodiesel to qualify for the U.S. biomass-based diesel program under a less stringent review process," the release noted.

"The unfortunate fact is that if EPA approves Argentina's application, we could be looking at 600 million gallons or more of Argentine biodiesel imported to the U.S., displacing our own domestic production," Kimberley said. "We know this because an Argentinean tax subsidy would allow each gallon of biodiesel from Argentina to enter the United States at prices lower than biodiesel produced in the U.S.," he continued.

According to the IBB release, "Kimberley said Ambassador Froman and his staff were aware of the issue and receptive to the Iowa Biodiesel Board's point of view."

Kimberley also talked to Froman about the Renewable Fuel Standard.

Rob Kaufmann

Vice President, Environmental Regulatory Affairs

Koch Companies Public Sector, LLC

600 14th Street, NW Suite 800

Washington, DC 20005

Ex. 6 - Personal Privacy

Robert.Kaufmann@kochps.com

To: O'Grady, Devin[Devin.O'Grady@NRCan-RNCan.gc.ca]; Lie, Sharyn[Lie.Sharyn@epa.gov];
Camobreco, Vincent[Camobreco.Vincent@epa.gov]
Cc: Talbot, Ruth[Ruth.Talbot@NRCan-RNCan.gc.ca]
From: Argyropoulos, Paul
Sent: Mon 8/11/2014 2:15:24 PM
Subject: RE: RFS

Hello Devin. I'm just back from vacation today. I'm forwarding your email / request to our LCA team. They will be best able to discuss in detail all your questions. Someone from their team will look to set up a convenient time for a call.

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

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From: O'Grady, Devin [mailto:Devin.O'Grady@NRCan-RNCan.gc.ca]
Sent: Wednesday, August 06, 2014 1:33 PM
To: Argyropoulos, Paul
Cc: Talbot, Ruth
Subject: RFS

Hello Paul,

Don O'Connor of S&T Consultants (GHGenius) provided your contact info. My colleagues at Natural Resources Canada as well as Environment Canada, responsible for Canada's *Renewable Fuels Regulations*, are interested in better understanding certain elements of the U.S. RFS, in particular:.

- The Notice of Data Availability process
- EPA's interaction with the GREET model
- Pathway approval process
- How the various models (GREET, FASOM, FAPRI) are used

We would appreciate having a call to discuss these areas of the RFS. Would you and your colleagues be available sometime next week, Aug 11 – 15th?

Regards,

Devin

Devin O'Grady

Fuels and Refining

Oil Sands and Energy Security Division

Natural Resources Canada

Ex. 6 - Personal Privacy

To: Lindsay Fitzgerald[l.e.c.fitzgerald@gmail.com]
From: Argyropoulos, Paul
Sent: Mon 8/4/2014 2:00:26 PM
Subject: Re: Extension of the 2013 RFS Volume Standard Compliance Dates

Yeah. Back next Monday. Enjoy. Catch up then.

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Mobile: Ex. 6 - Personal Privacy



Wow. I'm glad I'm on vacation now. I'm sorry for what you are dealing with. I'm out of town for the next 2 weeks, for work, but I'll be around after. Moving to Maryland officially on the 15th!!! We need to catch up it's been too long.
Lindsay

On Thursday, July 31, 2014, Argyropoulos, Paul <Argyropoulos.Paul@epa.gov> wrote:

To Interested Parties:

EPA is taking direct final action to extend the compliance deadline for the 2013 renewable fuel standards (RFS). The current deadline is September 30, 2014. The new deadline will be 30 days following publication in the Federal Register of the final 2014 RFS Standards. This is being done to assist industry with managing their compliance with both the 2013 and 2014 renewable fuel standards. The action is being taken because we are still working on the 2014 RFS final standards and we are taking the time to get them right. The Agency intends to issue the final 2014 RFS RVO as soon as possible. This extension is not intended to signal a delay, but instead ensures that the 2013 compliance deadline is directly linked to the 2014 RVO promulgation date to improve EPA's efficiency in implementing the program this year. This extension would allow for any necessary adjustment to the compliance deadline should the interagency process not conclude in time to support the current compliance schedule.

For more information: <http://epa.gov/otaq/fuels/renewablefuels/regulations.htm>

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

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--

Lindsay Clinton Fitzgerald

[Ex. 6 - Personal Privacy]

L.E.C.Fitzgerald@gmail.com

Instagram: [frecklesandcowspots](#)

Twitter: [@LinCFitz](#)

www.frecklesandcowspots.blogspot.com

To: Delahoussaye Dayne[Dayne.Delahoussaye@nesteoil.com]
From: Argyropoulos, Paul
Sent: Thur 7/31/2014 7:02:51 PM
Subject: RE: Extension of the 2013 RFS Volume Standard Compliance Dates

Hi Dayne,

I added you.

Take care, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

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Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Delahoussaye Dayne [mailto:Dayne.Delahoussaye@nesteoil.com]
Sent: Thursday, July 31, 2014 2:38 PM
To: Argyropoulos, Paul
Subject: FW: Extension of the 2013 RFS Volume Standard Compliance Dates

Paul

Can you add me to this distribution list for future notes?

Dayne.Delahoussaye@nesteoil.com

Thanks in advance

Dayne

Dayne A. Delahoussaye

Legal Counsel and Regulatory Affairs Manager (USA and Canada)

Neste Oil - Houston

1800 West Loop South, Suite 1700
Houston, Texas USA 77027

713.407.4415 - office

 mobile

Dayne.Delahoussaye@NesteOil.com

From: Fernandes Neville

Sent: Thursday, July 31, 2014 1:34 PM

To: Delahoussaye Dayne

Subject: Fwd: Extension of the 2013 RFS Volume Standard Compliance Dates

Begin forwarded message:

From: "Argyropoulos, Paul" <Argyropoulos.Paul@epa.gov>

Date: July 31, 2014 at 1:09:43 PM CDT

To: Undisclosed recipients;;

Subject: Extension of the 2013 RFS Volume Standard Compliance Dates

To Interested Parties:

EPA is taking direct final action to extend the compliance deadline for the 2013 renewable fuel standards (RFS). The current deadline is September 30, 2014. The new deadline will be 30 days following publication in the Federal Register of the final 2014 RFS Standards. This is being done to assist industry with managing their compliance with both the 2013 and 2014 renewable fuel standards. The action is being taken because we are still working on the 2014 RFS final standards and we are taking the time to get them right. The Agency intends to issue the final 2014 RFS RVO as soon as possible. This extension is not intended to signal a delay, but instead ensures that the 2013 compliance deadline is directly linked to the 2014 RVO promulgation date to improve EPA's efficiency in implementing the program this year. This extension would allow for any necessary adjustment to the compliance deadline should the interagency process not conclude in time to support the current compliance schedule.

For more information: <http://epa.gov/otaq/fuels/renewablefuels/regulations.htm>

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

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Web: www.epa.gov

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Due to the insecure nature of this medium, this or any following message may have been altered without the knowledge of sender. The sender will therefore not be liable for the message if modified.

To: Charlie Drevna[CDrevna@afpm.org]
From: Argyropoulos, Paul
Sent: Thur 7/31/2014 6:28:31 PM
Subject: RE: Extension of the 2013 RFS Volume Standard Compliance Dates

Good. Not sure exactly what your requested. Too many requests, so little memory..

Take care.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Charlie Drevna [mailto:CDrevna@afpm.org]
Sent: Thursday, July 31, 2014 2:19 PM
To: Argyropoulos, Paul
Subject: Re: Extension of the 2013 RFS Volume Standard Compliance Dates

Paul,

Got your voice mail. Thanks. Isn't this what AFPM requested originally?

Charlie

Sent from my iPad

Charles T. Drevna

President

American

Fuel & Petrochemical

Manufacturers

1667 K Street NW

Suite 700

Washington, DC 20006

202.457.0480 office

Ex. 6 - Personal Privacy

 direct

202.457.0486 fax

Cdrevna@afpm.org

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On Jul 31, 2014, at 2:09 PM, "Argyropoulos, Paul" <Argyropoulos.Paul@epa.gov> wrote:

To Interested Parties:

EPA is taking direct final action to extend the compliance deadline for the 2013 renewable fuel standards (RFS). The current deadline is September 30, 2014. The new deadline will be 30 days following publication in the Federal Register of the final 2014 RFS Standards. This is being done to assist industry with managing their compliance with both the 2013 and 2014 renewable fuel standards. The action is being taken because we are still working on the 2014 RFS final standards and we are taking the time to get them right. The Agency intends to issue the final 2014 RFS RVO as soon as possible. This extension is not intended to signal a delay, but instead ensures that the 2013 compliance deadline is directly linked to the 2014 RVO promulgation date to improve EPA's efficiency in implementing the program this year. This extension would allow for any necessary adjustment to the compliance deadline should the interagency process not conclude in time to support the current compliance schedule.

For more information: <http://epa.gov/otaq/fuels/renewablefuels/regulations.htm>

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

To: Rob Kaufman (robert.kaufmann@kochps.com)[robert.kaufmann@kochps.com]
From: Argyropoulos, Paul
Sent: Thur 7/31/2014 6:16:22 PM
Subject: FW: Extension of the 2013 RFS Volume Standard Compliance Dates

FYI.

The email I inputted was in error. I corrected it and am forwarding this to you as FYI.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Argyropoulos, Paul
Sent: Thursday, July 31, 2014 2:10 PM
Subject: Extension of the 2013 RFS Volume Standard Compliance Dates

To Interested Parties:

EPA is taking direct final action to extend the compliance deadline for the 2013 renewable fuel standards (RFS). The current deadline is September 30, 2014. The new deadline will be 30 days following publication in the Federal Register of the final 2014 RFS Standards. This is being

done to assist industry with managing their compliance with both the 2013 and 2014 renewable fuel standards. The action is being taken because we are still working on the 2014 RFS final standards and we are taking the time to get them right. The Agency intends to issue the final 2014 RFS RVO as soon as possible. This extension is not intended to signal a delay, but instead ensures that the 2013 compliance deadline is directly linked to the 2014 RVO promulgation date to improve EPA's efficiency in implementing the program this year. This extension would allow for any necessary adjustment to the compliance deadline should the interagency process not conclude in time to support the current compliance schedule.

For more information: <http://epa.gov/otaq/fuels/renewablefuels/regulations.htm>

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

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Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

To: Larry Pearce[larry@governorscoalition.org]
From: Argyropoulos, Paul
Sent: Tue 7/29/2014 1:56:22 PM
Subject: RE: Actual Production under RFS

Hi Larry,

I'm scrambling on many things so the only initial help I can offer is for you to access our EMTS info on the web and take a look at that. Keep in mind that there are numbers for RINs and numbers for Volumes. Also, I'm not sure if / how it accounts for differences in volumes produced and then volumes exported (those volumes / RINs would have to be retired and subtracted from straight production numbers). We are very thin so it's not likely we can do anything else other than direct you right now. Also, as you know, 2013 compliance hasn't even been reported so verification of those volumes is simply not possible right now.

Here's a link to get you to where to navigate to the data: <http://www.epa.gov/otaq/fuels/rfsdata/>

Good luck.

Paul

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Phone: 202-564-1123
Mobile: Ex. 6 - Personal Privacy
Email: argyropoulos.paul@epa.gov
Web: www.epa.gov

-----Original Message-----

From: Larry Pearce [mailto:larry@governorscoalition.org]
Sent: Tuesday, July 29, 2014 9:49 AM
To: Argyropoulos, Paul
Subject: Actual Production under RFS

Paul,
Hope you're doing well.
I'm working on a memo for the governors and I'd like to show RFS statutory levels and actual production levels for every year since the RFS was passed. I've got the statutory levels but having a hard time finding a reliable list of actual yearly production figures for each of the years covered by the RFS.
Can you help?
Thanks.

Larry

Ex. 6 - Personal Privacy

To: Kaufmann, Robert C.[Robert.Kaufmann@kochps.com]
Cc: Alexander, Evan[Evan.Alexander@kochind.com]
From: Argyropoulos, Paul
Sent: Tue 7/22/2014 1:16:15 PM
Subject: RE: Friday's Meeting

Gentlemen,

It was a pleasure meeting you last Friday. I have added you to my email blast list as I suggested and you requested. This will certainly help keep you abreast of related actions in real time. I also suggest you go to this link and sign up for our EnviroFlash Service.

<https://enviroflash.epa.gov/enviroflashOTAQPublic/Subscriber.do?method=start>

Please let me know if you have any questions.

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

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Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Kaufmann, Robert C. [mailto:Robert.Kaufmann@kochps.com]
Sent: Monday, July 21, 2014 4:37 PM
To: Argyropoulos, Paul
Cc: Alexander, Evan
Subject: Friday's Meeting

Dear Paul,

Thank you for taking the time to meet with Evan Alexander and me on Friday to discuss Flint Hills Resources, generally, our grain processing operations, and the impact of the Renewable Fuel Standard. We appreciated the opportunity to get your perspective and provide our point of view to you, and would be happy to continue to share the latter with others in EPA, as appropriate. I will be in touch after consulting with FHR to get your thoughts on what a presentation to Chris Grundler, Janet McCabe, and others might focus on.

We greatly appreciate your willingness to include us on your distribution lists, going forward, so that we are in a position to learn of relevant, public information at the same time it is disseminated widely to other market participants. We believe this will help ensure equal access to information by market participants.

Thank you again for your time, and we look forward to staying in touch.

Best regards,

Rob

Rob Kaufmann

Vice President, Environmental Regulatory Affairs

Koch Companies Public Sector, LLC

600 14th Street, NW Suite 800

Washington, DC 20005

Ex. 6 - Personal Privacy

Robert.Kaufmann@kochps.com

To: Tim Hogan[THogan@afpm.org]
From: Argyropoulos, Paul
Sent: Mon 7/21/2014 12:28:17 PM
Subject: RE: OTAQ address change

It's the L street gang that's moving over. Chris's and my address remain the same as before.

Thanks, Paul

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Phone: 202-564-1123
Mobile: Ex. 6 - Personal Privacy
Email: argyropoulos.paul@epa.gov
Web: www.epa.gov

-----Original Message-----

From: Tim Hogan [mailto:THogan@afpm.org]
Sent: Monday, July 21, 2014 8:23 AM
To: Argyropoulos, Paul
Subject: OTAQ address change

Paul, Who does this apply to? Everyone at 1310 L? Everyone at OTAQ in D.C. including you and Chris Grundler?

Tim

-----Original Message-----

From: EnviroFlash [mailto:enviroflash@epa.gov]
Sent: Friday, July 18, 2014 7:02 PM
To: Tim Hogan
Subject: Important RFS Announcements

1. EPA's Office of Transportation and Air Quality office in Washington, D.C. is moving! Beginning July 28, all materials should be sent to the new addresses below.

US Mail:
U.S. Environmental Protection Agency
William Jefferson Clinton Building
Mail Code 6405A
Room 6520V
1200 Pennsylvania Ave NW
Washington, DC 20460

Courier Address:
U.S. Environmental Protection Agency
William Jefferson Clinton Building
Mail Code 6405A
Room 6520V
1200 Pennsylvania Ave NW
Washington, DC 20004

2. The Pathways II rulemaking was published in the Federal Register today, therefore the effective date for these regulation changes will be August 18, 2014 (30 days after publication). The Pathways II rule qualifies additional fuel pathways that the Agency has determined meet the lifecycle greenhouse gas (GHG) reduction requirements under the RFS program. For more information, see the EPA website: <http://www.epa.gov/otaq/fuels/renewablefuels/regulations.htm>

3. The voluntary Quality Assurance Program (QAP) was also published in the Federal Register today, therefore the effective date for these regulation changes will be September 18, 2014 (60 days after publication). The QAP rule allows regulated parties to purchase RINs validated and verified by independent third parties according to an approved EPA protocol. For more information, see the EPA website: <http://www.epa.gov/otaq/fuels/renewablefuels/regulations.htm>

As a reminder, QAP interim period program participants should complete any retrospective audits of a renewable fuel production facility by September 18, 2014. After that date, QAP auditors should perform only prospective audits prior to the generation of RINS.

Additional information about the implementation of QAP will be added to the EPA website in the coming weeks: <http://www.epa.gov/otaq/fuels/renewablefuels/qap.htm>

Please contact EMTS Support at support@epamts-support.com if you have questions.

You have received this message because you are subscribed to the EnviroFlash for the Office of Transportation and Air Quality (OTAQ).

To unsubscribe or to change your subscription settings, go to:
<https://enviroflash.epa.gov/enviroflashOTAQPublic/Subscriber.do?method=start>.

To: Jacob R Wildeson[jacob.wildeson@basf.com]; Mylan, Christopher[Mylan.Christopher@epa.gov]
From: Argyropoulos, Paul
Sent: Wed 7/16/2014 2:22:19 PM
Subject: RE: RFS Incentives

How about Friday morning at around 9 am?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Jacob R Wildeson [mailto:jacob.wildeson@basf.com]
Sent: Wednesday, July 16, 2014 10:21 AM
To: Mylan, Christopher
Cc: Argyropoulos, Paul
Subject: Re: RFS Incentives

Hey Chris,

Thanks again for the the introduction.

Paul,

Could you let me know when is a good time to reach you on Thursday or Friday?

Thanks,

Jake

From: "Mylan, Christopher" <Mylan.Christopher@epa.gov>
To: "jacob.wildeson@basf.com" <jacob.wildeson@basf.com>
Cc: "Argyropoulos, Paul" <Argyropoulos.Paul@epa.gov>
Date: 07/16/2014 10:01 AM
Subject: RFS Incentives

Hi Jacob,

It was nice speaking with you the other day. Copied on this email is The Office of Transportation and Air Quality's Senior Policy Advisor, who regularly works with an array of stakeholders on EPA's Renewable Fuels Standard. He will be able to walk you through the various incentives and mechanisms that allow the RFS to function. Please give him a call or email at your earliest convenience.

Paul's contact information is as follows:

Ph: 202-564-1123
Email: argyropoulos.paul@epa.gov

Regards,

Christopher Mylan
U.S. EPA
Office of Transportation and Air Quality
Phone: 202-564-7411

To: ARNALDOV@iadb.org[ARNALDOV@iadb.org]
Cc: Simon, Karl[Simon.Karl@epa.gov]; Lie, Sharyn[Lie.Sharyn@epa.gov]; Blubaugh, Jim[Blubaugh.Jim@epa.gov]; Cam Hill-Macon[HillMacon.Cam@epa.gov]; Hengst, Benjamin[Hengst.Benjamin@epa.gov]
From: Argyropoulos, Paul
Sent: Wed 7/9/2014 1:34:56 PM
Subject: EPA Representation at the BNDES July 28 Workshop

Dear Mr. Arnaldo Vieira de Carvalho

I'm responding to your several requests for EPA representation at the upcoming July 28 BNDES Workshop. I will be happy to represent EPA's Office of Transportation and Air Quality and to present an overview of the USEPA Renewable Fuel Standard Program. I can provide some history and a summary of the current situation. As you know, we are currently in the middle of our annual standard setting rulemaking process so I will only be able to present a perspective on what was proposed for 2014, not what the outcome will be.

Please provide me with any details necessary for attendance and participation.

Thank you and I look forward to the event.

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

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Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Vieira de Carvalho, Arnaldo [<mailto:ARNALDOV@iadb.org>]
Sent: Tuesday, July 01, 2014 6:35 PM
To: Hill-Macon, Cam
Cc: Artur Yabe Milanez (milan@bnDES.gov.br); 'dpschenk@aca-assoc.com'; Diaz Betancourth, Diana Paola; Gerard Ostheimer (gerry1255@yahoo.com)
Subject: Invitation to the 1st IDB/BNDES Workshop on Financing Biofuels Investments in Latin America and Caribbean (LAC), July 28, Washington DC

Dear Ms. Cam Hill-Macon,

We are glad to invite you to participate in an one-day workshop supported by BNDES/IDB on financing biofuels in Latin America and the Caribbean (LAC). It will include panelists from the US Government, LAC countries, biofuels producers, technology firms, BNDES, IDB, other financial institutions and several international market analysts and experts in the theme. We would like to have your participation as a panelist at Session 1 in the topic "Overview of the biofuel market situation in the U.S. in the near term", as shown in the attached preliminary event agenda.

The main purpose of the event is to discuss present and future biofuels and bio-based products markets and potential biofuels investments where BNDES and IDB can provide financial support and whose results will benefit biofuel industry throughout LAC. The workshop will be held on July 28, 2014 at the Inter-American Development Bank headquarters in downtown Washington DC, prior to the Biomass 2014 conference hosted by the U.S. Department of Energy on July 29 and 30. Both events are free, but participants must register in advance. Information about Biomass 2014 can be found at: http://www1.eere.energy.gov/bioenergy/biomass_2014.html

The BNDES/IDB workshop will include:

1. Overview of the biofuel market situation in U.S., Europe, Brazil, and other select LAC countries
2. New markets, technologies and certification trends
3. BNDES and IDB's commitment to biofuels and their ability to support development projects.
4. Challenges and opportunities for accessing financing for the industry in LAC

Please contact either Artur Yabe Milanez (milan@bndes.gov.br) or Arnaldo Vieira de Carvalho (arnaldov@iadb.org) if you have questions, and to confirm that you will attend the BNDES/IDB workshop.

Best regards

Artur Yabe Milanez
Banco Nacional de Desenvolvimento Economico e Social (BNDES)

Industrial Area/Biofuels Dept

Sector Manager

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milan@bndes.gov.br

Arnaldo Vieira de Carvalho

Inter-American Development Bank (IDB)

Energy Division

Lead Sustainable Energy Specialist

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arnaldov@iadb.org

To: Monte Shaw[mshaw@iowarfa.org]
From: Argyropoulos, Paul
Sent: Tue 7/8/2014 6:57:49 PM
Subject: RE: EPA representative needed for 6th Annual Iowa biofuels tour

OK, great. Thanks. I'm sure they'll ask questions, just not be able to answer any.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

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Web: www.epa.gov

From: Monte Shaw [mailto:mshaw@iowarfa.org]
Sent: Tuesday, July 08, 2014 2:56 PM
To: Argyropoulos, Paul
Subject: RE: EPA representative needed for 6th Annual Iowa biofuels tour

I double checked and we don't have any completed registration forms from EPA staff yet, but probably in the works. We look forward to hosting them!

Also, if there's something they want to see or learn about that's not on the schedule, just have them let us know that we'll try to accommodate if possible.

Monte Shaw

IRFA

Ex. 6 - Personal Privacy

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]
Sent: Tuesday, July 08, 2014 1:47 PM
To: Monte Shaw
Subject: RE: EPA representative needed for 6th Annual Iowa biofuels tour

Hi Monte. The agenda looks great. We have a couple staffers coming. Were you looking for something more?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Monte Shaw [<mailto:mshaw@iowarfa.org>]
Sent: Tuesday, July 08, 2014 11:28 AM
To: Argyropoulos, Paul
Subject: EPA representative needed for 6th Annual Iowa biofuels tour
Importance: High

Paul,

With so much going on from RFS rules, to cellulosic ethanol coming on-line commercially, to increased focus on conservation and water quality, to the increased access and sales of higher level blends...

...it would be really good for someone from the EPA in DC or Ann Arbor to attend this tour. We have a really, really good agenda this year. Very timely.

(The sponsors will cover any and all expenses allowed by EPA guidelines.)

Please let me know what you think.

Monte Shaw

IRFA

Ex. 6 - Personal Privacy

To: Monte Shaw[mshaw@iowarfa.org]
From: Argyropoulos, Paul
Sent: Tue 7/8/2014 6:46:37 PM
Subject: RE: EPA representative needed for 6th Annual Iowa biofuels tour

Hi Monte. The agenda looks great. We have a couple staffers coming. Were you looking for something more?

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Monte Shaw [mailto:mshaw@iowarfa.org]
Sent: Tuesday, July 08, 2014 11:28 AM
To: Argyropoulos, Paul
Subject: EPA representative needed for 6th Annual Iowa biofuels tour
Importance: High

Paul,

With so much going on from RFS rules, to cellulosic ethanol coming on-line commercially, to increased focus on conservation and water quality, to the increased access and sales of higher level blends...

...it would be really good for someone from the EPA in DC or Ann Arbor to attend this tour.
We have a really, really good agenda this year. Very timely.

(The sponsors will cover any and all expenses allowed by EPA guidelines.)

Please let me know what you think.

Monte Shaw

IRFA

Ex. 6 - Personal Privacy

To: Raburn, Janice[Janice.Raburn@bp.com]
From: Argyropoulos, Paul
Sent: Wed 6/25/2014 5:50:44 PM
Subject: RE: 2013 RFS Compliance Deadline Extended to September 30, 2014

Just added you.

BTW, congrats on your job anniversary (3 years) at BP. It popped up on Linked-In today.

Hope all is well. Loads of fun here, as you know.

Take care, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Raburn, Janice [mailto:Janice.Raburn@bp.com]
Sent: Wednesday, June 25, 2014 1:46 PM
To: Argyropoulos, Paul
Subject: FW: 2013 RFS Compliance Deadline Extended to September 30, 2014

Hi Paul,

I hope all is going well – I'm sure you wish there were more happening in the fuels world.

Would you please add me to your "Interested Party" distribution list (see below)?

I didn't receive the last one you sent. I would really appreciate it, as I am looking forward to seeing lots of announcements in the next few months!

Best,

Janice

Janice K. Raburn

Manager, Fuels Regulatory Advocacy
BP Products North America Inc.
1101 New York Ave NW, Suite 700
Washington, DC 20005

Ex. 6 - Personal Privacy

janice.raburn@bp.com

From: AFPM-COMMITTEES-FUELSCOMMITTEE [<mailto:afpm-committees-fuelscommittee-lists@mailingmaxx.afpm.org>] **On Behalf Of** Tim Hogan
Sent: Friday, June 06, 2014 1:28 PM
To: 'afpm-committees-fuelscommittee@mailingmaxx.afpm.org'
Subject: FW: 2013 RFS Compliance Deadline Extended to September 30, 2014

FYI Tim

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]
Sent: Friday, June 06, 2014 1:26 PM
Subject: 2013 RFS Compliance Deadline Extended to September 30, 2014

Dear Interested Parties:

EPA is taking final action to extend the compliance deadlines for the 2013 renewable fuel standards (RFS). The new deadlines are September 30, 2014 for obligated parties to submit compliance reports to EPA, and January 30, 2015 for submission of third party verification reports. EPA is extending these deadlines to assist industry with managing their compliance with both the 2013 and 2014 renewable fuel standards. EPA intends to issue the 2014 volume standards in the near future.

For more information: <http://epa.gov/otaq/fuels/renewablefuels/regulations.htm>

Regards,

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

To: John Eichberger[jeichber@nacsonline.com]
Cc: Hengst, Benjamin[Hengst.Benjamin@epa.gov]; David H. Fialkov
(DFialkov@steptoe.com)[DFialkov@steptoe.com]
From: Argyropoulos, Paul
Sent: Thur 6/19/2014 5:21:55 PM
Subject: RE: NACS meeting with OTAQ June 25

Hi John,

Our Address is:

1200 Pennsylvania Ave, NW

Washington DC

Our Building is:

William J. Clinton North Building

Location:

The Entrance is located mid-block on 12th Street NW between Constitution Ave and Pennsylvania Ave

Enter the north building lobby and check in with the guards. They will have to have an official government issued picture ID (passport works) and go through security screening. They will sign in and receive a day pass for the building. The guard will need to call up to our office (I am in room 6522) and we can send down someone to escort her up to our office for the meeting. The guard can try my number first but if I don't answer they can call our main number and request an escort up for our meeting (564-1682)

It's best to arrive about 15 minutes before our actual meeting time so she can be checked in and then escorted up. That should allow for an on-time start.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: John Eichberger [<mailto:jeichber@nacsonline.com>]

Sent: Thursday, June 19, 2014 12:11 PM

To: Argyropoulos, Paul

Cc: Hengst, Benjamin; David H. Fialkov (DFialkov@steptoe.com)

Subject: NACS meeting with OTAQ June 25

Hey Paul,

We are all set for next Wednesday at 9:30. Below is the list of attendees...please let me know where they should go for security screening and for whom they should ask when they arrive. My colleague David Fialkov at Steptoe and Johnson will be escorting them to the meeting. On the agenda for discussion will be status of implementation of the RFS and what can NACS and its members do to help.

Please let me know if you need any additional information. Thanks again!

David Fialkov

Associate

Step toe and Johnson

Washington, DC

Steve Loehr

Vice President, Operations Support

Kwik Trip

LaCrosse, WI

NACS Treasurer

Tom Robinson

President

Robinson Oil Corporation

Santa Clara, CA

NACS Past Chairman

Rich Spresser

President & CEO

Pester Marketing

Denver, CO

Ned Bowman

Executive Director

Florida Petroleum Marketers and Convenience Store Association

Tallahassee, FL

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]

Sent: Monday, June 02, 2014 12:40 PM

To: John Eichberger

Cc: Hengst, Benjamin

Subject: RE: Invitation to your June 25 Legislative Committee Meeting

Hi John,

I put a hold on our calendars. Sounds fine.

Please let me know how many people will be attending so I can set aside an appropriate room.

Also, please provide names, companies, titles etc. in advance to aide in clearing security.

If you have a general agenda, please let me know as well.

Take care, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: John Eichberger [<mailto:jeichber@nacsonline.com>]

Sent: Monday, June 02, 2014 12:30 PM

To: Argyropoulos, Paul; John Eichberger

Cc: Hengst, Benjamin

Subject: RE: Invitation to your June 25 Legislative Committee Meeting

Thanks Paul. We would bring a small group to meet with you at your offices. Just a meeting. .. no presentations. I want to introduce them as resources to EPA and let them hear from you what is going on.

Would a 9:15 or 9:30 meeting work?

Sent via the Samsung GALAXY S® 5, an AT&T 4G LTE smartphone

----- Original message -----

From: "Argyropoulos, Paul"

Date: 06/02/2014 9:04 AM (GMT-06:00)

To: John Eichberger

Cc: "Hengst, Benjamin"

Subject: Invitation to your June 25 Legislative Committee Meeting

Hi John,

ED_000497_00008907

Just closing the loop on your invitation for Chris to speak at your June 25 Legislative Committee Meeting. Unfortunately, Chris is not in town that week. He extends his apologies but kindly has offered up myself, or possibly Ben Hengst to speak in his stead. Please let us know if that's something you are interested in and if so, please provide us with the logistical details (time, place, etc) so we can accommodate your request.

Best Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

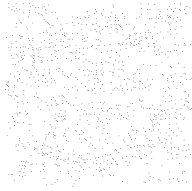
Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

To: Alter, Jacob[JAlter@meridian.org]; Ives, Phillip[pives@meridian.org]
From: Argyropoulos, Paul
Sent: Thur 6/19/2014 4:36:54 PM
Subject: RE: State Department-Sponsored International Visitor from France



Looks good. Thanks.

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Alter, Jacob [mailto:JAlter@meridian.org]
Sent: Thursday, June 19, 2014 11:42 AM
To: Ives, Phillip; Argyropoulos, Paul
Subject: RE: State Department-Sponsored International Visitor from France

Hi Paul,

Thank you for putting this together and agreeing to meet with our visitor.

Below is the information that we will include in her briefing book tomorrow.

Could you please confirm that everything is accurate?

Thank you,

Jake

10:00 am Please depart for your next meeting.

U.S. Environmental Protection Agency

William J. Clinton North Building

1200 Pennsylvania Ave, NW, Room 6522

Washington, DC 20004

Contact Name: Mr. Paul Argyropoulos

Contact's Direct Telephone: (202) 564-1123

Telephone: (202) 564-1682

Website: www.epa.gov

Twitter: @EPA

Directions: Please take a taxi to this meeting. **Make sure to arrive no later than 10:45 am.** The entrance is located mid-block on 12th Street between Constitution Avenue and Pennsylvania Avenue. Enter the North Building lobby and check in with the guards. Have them call Mr. Argyropoulos (202-564-1123) who will send someone down to escort you to your meeting. If he does not answer, please call the main line (202-564-1682).

11:00 am – You have an appointment with
12:00 pm

Mr. Paul Argyropoulos

Senior Policy Advisor

Office of Transportation and Air Quality

Email: argyropoulos.paul@epa.gov

Topic: EPA administration of the Renewable Fuel Standard (RFS), how RFS production mandates might change, the outlook for E15, and related topics

Mr. Paul Argyropoulos is a Senior Policy Advisor in the Environmental Protection Agency's (EPA) Office of Transportation and Air Quality. He is responsible for providing advice and analysis to the Office Director on a broad range of transportation program issues with a focus on fuels. He chaired EPA's intra agency work group for the national renewable fuels standard programs implemented under both the Energy Policy Act of 2005 and the Energy Independence and Security Act of 2007. Mr. Argyropoulos also spent 10 years in the private sector, eight with Hart Downstream Energy serving in a number of positions, including as Executive Director of the International Fuel Quality Center and Director of U.S. Federal Affairs, and two years with the American Petroleum Institute (API), where he provided regulatory and policy coordination supporting API's Downstream and Fuels Committee and various related workgroups on national and state regulatory and policy issues. Overall, Mr. Argyropoulos has 30 years of experience working in the transportation and fuel quality sector.

The **Office of Transportation and Air Quality's (OTAQ)** mission is to protect human health and the environment by: (1) reducing air pollution and greenhouse gas emissions from mobile sources and the fuels that power them; (2) advancing clean fuels and technology; and (3) encouraging business practices and travel choices that minimize emissions.

OTAQ's programs address emissions from the range of mobile sources: cars and light trucks, large trucks and buses, farm and construction equipment, lawn and garden equipment, non-road recreational vehicles (e.g., dirt bikes and snowmobiles), marine engines, aircraft, and locomotives.

The **Environmental Protection Agency (EPA)** provides leadership in the nation's

environmental science, research, education and assessment efforts. EPA works closely with other federal agencies, state and local governments, and Indian tribes to develop and enforce regulations under existing environmental laws. EPA is responsible for researching and setting national standards for a variety of environmental programs and delegating responsibility to states and tribes for issuing permits, and monitoring and enforcing compliance. Where national standards are not met, EPA can issue sanctions and take other steps to assist the states and tribes in reaching the desired levels of environmental quality. The Agency also works with industries and all levels of government in a wide variety of voluntary pollution prevention programs and energy conservation efforts. In July of 1970, the White House and Congress worked together to establish the EPA in response to the growing public demand for cleaner water, air and land. Prior to the establishment of the EPA, the national government was not structured to make a coordinated attack on the pollutants which harm human health and degrade the environment. The EPA was assigned the task of repairing the damage already done to the natural environment and establishing new criteria to guide Americans in making a cleaner environment a reality. Today, EPA employs approximately 18,000 people in Washington, DC and has 10 regional offices and 17 labs across the country. EPA employs a highly educated, technically trained staff, more than half of whom are engineers, scientists, and environmental protection specialists. A large number of employees are legal, public affairs, financial, and computer specialists. EPA is led by the Administrator who is appointed by the President of the United States.



Jacob Alter
Program Associate & Evaluation Facilitator

MERIDIAN Meridian International Center | Professional Exchanges Division
1624 Crescent Place, NW, Washington, DC 20009
T. (202) 939-5507 | F. (202) 332-1575 | www.meridian.org

Follow us on:



From: Ives, Phillip
Sent: Thursday, June 19, 2014 8:03 AM
To: Argyropoulos, Paul
Cc: Alter, Jacob
Subject: RE: State Department-Sponsored International Visitor from France

Thanks, Paul. I was out yesterday, so please forgive my delayed reply. Appreciate this information. We will share with Ms. Sicard. Cheers, Phillip

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]
Sent: Tuesday, June 17, 2014 3:52 PM
To: Ives, Phillip
Subject: RE: State Department-Sponsored International Visitor from France

Hi Phillip. I've attached a brief bio.

WRT your request for specific info to access our building, the following information should provide what you need:

Our Address is:

1200 Pennsylvania Ave, NW

Washington DC

Our Building is:

William J. Clinton North Building

Location:

The Entrance is located mid-block on 12th Street NW between Constitution Ave and Pennsylvania Ave

Enter the north building lobby and check in with the guards. She will have to have an official government issued picture ID (passport works) and go through security screening. She will sign in and receive a day pass for the building. The guard will need to call up to our office (I am in room 6522) and we can send down someone to escort her up to our office are for the meeting. The guard can try my number first but if I don't answer they can call our main number and request an escort up for our meeting (564-1682)

It's best to arrive about 15 minutes before our actual meeting time so she can be checked in and then escorted up. That should allow for an on-time start.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Ives, Phillip [<mailto:pives@meridian.org>]

Sent: Tuesday, June 17, 2014 3:25 PM

To: Argyropoulos, Paul

Cc: Alter, Jacob; Gearhart, Diana

Subject: RE: State Department-Sponsored International Visitor from France

Paul – greetings again from Meridian, and happy Tuesday. Just a quick note to let you know that we are putting together the briefing book for our visitor from France, Ms. Sicard. We always try to include a brief bio of those with whom our visitors will be meeting, and I'm hoping you can send me yours. We will include it in the book, which will go to press early on Friday. That said, we plan to send the draft book to the State Department tomorrow afternoon, so if you could send yours earlier, that would be very helpful.

Second, is there someone I should contact regarding specific arrival instructions for the meeting with you at EPA? I want to make sure to provide very specific guidance for Ms. Sicard so that she can quickly and efficiently enter your building and get to you in good time. Many thanks, Phillip



From: Ives, Phillip
Sent: Wednesday, June 11, 2014 10:23 AM
To: 'Argyropoulos, Paul'
Subject: RE: State Department-Sponsored International Visitor from France

Thanks very much, Paul. If I learn anything new about her visit, I'll be sure to let you know. All best, Phillip

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]
Sent: Wednesday, June 11, 2014 9:17 AM
To: Ives, Phillip
Subject: RE: State Department-Sponsored International Visitor from France

Hello Phillip,

Per our conversation, Thursday June 26th at 11:00am works for me.

Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Ives, Phillip [<mailto:pives@meridian.org>]

Sent: Friday, June 06, 2014 11:37 AM

To: Argyropoulos, Paul

Subject: State Department-Sponsored International Visitor from France

Dear Mr. Argyropoulos:

Greetings from Meridian International Center. Meridian develops professional programs for USG-sponsored international visitors to the U.S. under a grant from the U.S. Department of State's Bureau of Educational and Cultural Affairs (ECA).

I am writing to you at the suggestion of Diana Gearhart about the upcoming visit to the United States by Ms. Celine Sicard from France. She is a market analyst for SucDen in Paris. She will travel to the United States under ECA's auspices to explore a range of issues related to renewable energy and, in particular, ethanol. Please see the attached document, which provides a brief biographic sketch of Ms. Sicard and an overview of the broad objectives of her program in the U.S.

Ms. Sicard will be in Washington for meetings from Monday, June 23, through Thursday afternoon, June 26, after which she will travel to Dallas, Corpus Christi, Des Moines and Minneapolis. We have received considerable guidance from our Embassy in Paris, and even a few suggestions from Ms. Sicard herself as to the meetings she hopes to have while in the U.S. As you might imagine, she is very interested in meeting with people who focus on ethanol, and in particular, issues concerning ethanol that might influence its pricing in the market.

That's the reason I'm writing to you. Specifically, I am hoping that you could have a conversation with her about the EPA's administration of the Renewable Fuel Standard, how RFS production mandates might change, the outlook for E15, and related topics.

Given the way Ms. Sicard's schedule is developing, it would be very helpful if you could meet with her at 11:15 a.m. on Wednesday, June 25. If that option doesn't work, please let me know. I should be able to find another time that fits your schedule and hers.

Thank you very much for considering this request. I look forward to hearing from you.

Best regards, Phillip

P.S. I am also attaching the pre-clearance information that Diana always asks me to send over for your security people. Please let me know if you need this in a different format.



F. 202.332.1575 | www.meridian.org

Follow us on:



To: Thomas J. Bond[bondtj2@windstream.net]
From: Argyropoulos, Paul
Sent: Wed 6/18/2014 7:20:39 PM
Subject: RE: Ethanol Feedstock Co-Processing

Hi Tom. All I can tell you is to go directly to the helpdesk / support line people. I have no idea who is dealing with what specifically and we are channeling everything through our support team. We have a new policy in place here – which requires us to manage things this way. We are so understaffed I can't tell you. Beyond that, I'll just say things aren't easier, they just keep getting hard.

Good luck, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Thomas J. Bond [mailto:bondtj2@windstream.net]
Sent: Tuesday, June 17, 2014 10:35 AM
To: Argyropoulos, Paul
Subject: Ethanol Feedstock Co-Processing

Paul,

I know you and the OTAQ staff are busy with all the issues on the RFS and related RVO. However, I need to talk to one of your associates relate to the co-processing of sugars for ethanol

production prior to submitting a renewable fuel producer registration update request. Would you please pass this request along or recommend someone on the Help Desk to talk with on this subject.

Thanks

Tom

Thomas J. Bond

Transportation Fuels Technology, LLC



11391 Wilson Mills

Chardon, Ohio 44024

To: Ives, Phillip[pives@meridian.org]
From: Argyropoulos, Paul
Sent: Tue 6/17/2014 7:51:42 PM
Subject: RE: State Department-Sponsored International Visitor from France
Bio 2014 - Short - Paul Argyropoulos.doc



Hi Phillip. I've attached a brief bio.

WRT your request for specific info to access our building, the following information should provide what you need:

Our Address is:

1200 Pennsylvania Ave, NW

Washington DC

Our Building is:

William J. Clinton North Building

Location:

The Entrance is located mid-block on 12th Street NW between Constitution Ave and Pennsylvania Ave

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Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Ives, Phillip [<mailto:pives@meridian.org>]
Sent: Tuesday, June 17, 2014 3:25 PM
To: Argyropoulos, Paul
Cc: Alter, Jacob; Gearhart, Diana
Subject: RE: State Department-Sponsored International Visitor from France

Paul – greetings again from Meridian, and happy Tuesday. Just a quick note to let you know that we are putting together the briefing book for our visitor from France, Ms. Sicard. We always try to include a brief bio of those with whom our visitors will be meeting, and I'm hoping you can send me yours. We will include it in the book, which will go to press early on Friday. That said, we plan to send the draft book to the State Department tomorrow afternoon, so if you could send yours earlier, that would be very helpful.

Second, is there someone I should contact regarding specific arrival instructions for the meeting with you at EPA? I want to make sure to provide very specific guidance for Ms. Sicard so that she can quickly and efficiently enter your building and get to you in good time. Many thanks, Phillip



Phillip R. Ives
Program Officer

Meridian International Center

Professional Exchanges Division
1404 Crescent Place, NW, Washington, DC 20009
T: 800.424.2974x5885 / 202.939.5885

F: 202.332.1575 | www.meridian.org

Follow us on:



From: Ives, Phillip
Sent: Wednesday, June 11, 2014 10:23 AM
To: 'Argyropoulos, Paul'
Subject: RE: State Department-Sponsored International Visitor from France

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Sent: Wednesday, June 11, 2014 9:17 AM
To: Ives, Phillip
Subject: RE: State Department-Sponsored International Visitor from France

Hello Phillip,

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Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Ives, Phillip [<mailto:pives@meridian.org>]

Sent: Friday, June 06, 2014 11:37 AM

To: Argyropoulos, Paul

Subject: State Department-Sponsored International Visitor from France

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Greetings from Meridian International Center. Meridian develops professional programs for USG-sponsored international visitors to the U.S. under a grant from the U.S. Department of State's Bureau of Educational and Cultural Affairs (ECA).

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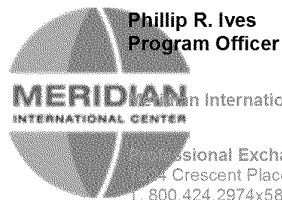
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Thank you very much for considering this request. I look forward to hearing from you.

Best regards, Phillip

P.S. I am also attaching the pre-clearance information that Diana always asks me to send over for your security people. Please let me know if you need this in a different format.



Phillip R. Ives
Program Officer

Meridian International Center

Professional Exchanges Division

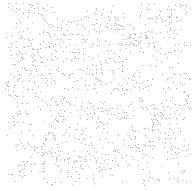
14 Crescent Place, NW, Washington, DC 20009
T. 800.424.2974x5885 / 202.939.5885

F. 202.332.1575 | www.meridian.org

Follow us on:



To: Ives, Phillip[pives@meridian.org]
From: Argyropoulos, Paul
Sent: Wed 6/11/2014 1:16:30 PM
Subject: RE: State Department-Sponsored International Visitor from France



Hello Phillip,

Per our conversation, Thursday June 26th at 11:00am works for me.

Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Ives, Phillip [mailto:pives@meridian.org]
Sent: Friday, June 06, 2014 11:37 AM
To: Argyropoulos, Paul
Subject: State Department-Sponsored International Visitor from France

Dear Mr. Argyropoulos:

Greetings from Meridian International Center. Meridian develops professional programs for USG-sponsored international visitors to the U.S. under a grant from the U.S. Department of State's Bureau of Educational and Cultural Affairs (ECA).

I am writing to you at the suggestion of Diana Gearhart about the upcoming visit to the United States by Ms. Celine Sicard from France. She is a market analyst for SucDen in Paris. She will travel to the United States under ECA's auspices to explore a range of issues related to renewable energy and, in particular, ethanol. Please see the attached document, which provides a brief biographic sketch of Ms. Sicard and an overview of the broad objectives of her program in the U.S.

Ms. Sicard will be in Washington for meetings from Monday, June 23, through Thursday afternoon, June 26, after which she will travel to Dallas, Corpus Christi, Des Moines and Minneapolis. We have received considerable guidance from our Embassy in Paris, and even a few suggestions from Ms. Sicard herself as to the meetings she hopes to have while in the U.S. As you might imagine, she is very interested in meeting with people who focus on ethanol, and in particular, issues concerning ethanol that might influence its pricing in the market.

That's the reason I'm writing to you. Specifically, I am hoping that you could have a conversation with her about the EPA's administration of the Renewable Fuel Standard, how RFS production mandates might change, the outlook for E15, and related topics.

Given the way Ms. Sicard's schedule is developing, it would be very helpful if you could meet with her at 11:15 a.m. on Wednesday, June 25. If that option doesn't work, please let me know. I should be able to find another time that fits your schedule and hers.

Thank you very much for considering this request. I look forward to hearing from you.

Best regards, Phillip

P.S. I am also attaching the pre-clearance information that Diana always asks me to send over for your security people. Please let me know if you need this in a different format.



Phillip R. Ives
Program Officer

Meridian International Center

Professional Exchanges Division

1404 Crescent Place, NW, Washington, DC 20009
T. 800.424.2974x5885 / 202.939.5885

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Follow us on:



To: Melinda Tomaino[tomainom@agc.org]
Cc: Leah Pilconis[pilconisl@agc.org]
From: Argyropoulos, Paul
Sent: Mon 6/9/2014 6:43:37 PM
Subject: RE: Uploading Speaker Materials, A/V, etc for AGC Enviro Conference
[RFS 2014 stds June 2014.pptx](#)
[Bio 2014 - Short - Paul Argyropoulos.doc](#)

Hi Melinda,

My presentation for Thursday.

Also, here's my bio.

Hope this is all you need.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Melinda Tomaino [mailto:tomainom@agc.org]

Sent: Friday, May 30, 2014 3:39 PM
To: Melinda Tomaino
Cc: Leah Pilconis
Subject: Uploading Speaker Materials, A/V, etc for AGC Enviro Conference

Dear CEC Speakers:

AGC's 2014 Contractors Environmental Conference is just two weeks away on June 12-13. We have asked for you to send in your materials (presentation outline or slides, your bio sketch, and any handouts) this Monday, June 2nd. We need to get as many in as possible on June 2nd so that we can start preparing the mobile app and thumb drives for the attendees. Please see below for instructions about uploading your materials. A few of you have already requested an extension; if you are unable to send your materials on June 2nd, please let me know ASAP.

A/V

AGC will have laptops in each room with preloaded presentations, pointers, remote "mice" and WiFi access. *If you need anything additional to support your presentation, please let me know ASAP.*

Uploading Your Materials to AGC's FTP Site

You can upload any size file to the AGC's FTP site, a special website to which both you and AGC staff have access. Instructions:

- Go to <http://www2.agc.org/upload>.
- Log in with username **agcftp** and password **password**.
- To upload a file:
 - Click on the **Upload a new file** link at the bottom of the page.
 - Navigate to the file you want to send and select it.
 - Click **OK**.
- Notify Crystal Yates (yatesc@agc.org) that you have uploaded the file(s) onto AGC's FTP site, and she will retrieve the file(s) from there.

The email with location and onsite issues is below for your convenience. Again, I'm available for any questions.

Participation is right around 100, not including our EPA guest speakers, which is the higher end of our estimate for this year. The participants are passionate about environmental issues and focused on helping their companies excel. We are aiming for a highly participatory program this year in addition to your informative presentations -- it is going to be a great, engaging program!

Regards,

Melinda

Melinda L. Tomaino, LEED® AP
AGC of America

www.agc.org

Twitter: [@AGCEnvironment](https://twitter.com/AGCEnvironment)
Quality People. Quality Projects.

From: Melinda Tomaino
Sent: Monday, May 12, 2014 5:38 PM
To: Melinda Tomaino
Cc: Leah Pilconis
Subject: Speakers: Location and where to go onsite at AGC's CEC

Dear CEC Speakers:

AGC's 2014 Contractors Environmental Conference is four weeks away on June 12-13. I want to be sure you have all the information you need! This week, it's all about the location.

Conference Location*

All events will be held on the **2nd Floor** at the

Renaissance Arlington Capital View
2800 S Potomac Avenue
Arlington, VA 22202

 www.marriott.com/waspy

Check-in

Check-in at the registration area at least 30 minutes prior to your session. If you're already registered and attending the conference, be sure to be at your session room a little early to make sure everything is as it should be, perform a quick presentation check, meet your session's Steering Committee volunteer and fellow speakers if speaking on a panel.

The CEC will be held in the meeting rooms along the front of the hotel on the 2nd Floor. Registration is outside Studio B. A hotel map is included in the most recently updated [schedule](#).

Contacting Staff Onsite

If you have questions onsite, please try the staff at the registration area on the 2nd Floor. There also will be several staff onsite, with staff ribbons on their badges, who can help. If you need to reach me, my personal cell-phone number is 202-380-7008 for use June 11, 12 and 13. If you have questions beforehand, please contact me at the office: 703-837-5415.

Session Room Assignments

We've updated the schedule to include the room assignments, including a map of the 2nd floor of the hotel. Click here to check out the updated [schedule](#).

Next week, the conference audio/visual package and your request for any additional A/V equipment.

Best Regards,

Melinda Tomaino

*Please note the correct hotel address above. There was an unfortunate typo on 5/2/2014 email---and I don't want you to go to the hotel across the street!

Melinda L. Tomaino, LEED® AP
Director, Green Construction
The Associated General Contractors of America
2300 Wilson Boulevard, Suite 300
Arlington, VA 22201

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

tomainom@agc.org

www.agc.org

Quality People. Quality Projects.

To: Howard S. Marks[hmarks1@verizon.net]
From: Argyropoulos, Paul
Sent: Mon 6/9/2014 5:30:20 PM
Subject: RE: Delay in 2014 RVO decision?

Hi Howard.

Extending the 2013 compliance date is a procedural decision, allowing additional time for the industry to submit their compliance reports. Our explanation of this is noted in the federal register notice announcing the extension. This decision was in no way intended to signal a delay in issuing the 2014 RFS Standards. We are working hard to issue the 2014 standards as quickly as possible.

Thanks Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Howard S. Marks [mailto:hmarks1@verizon.net]
Sent: Monday, June 09, 2014 11:54 AM
To: Argyropoulos, Paul
Subject: Delay in 2014 RVO decision?

Good morning, Paul: Much thanks for all your kind and generous assistance through the years.

Once he reads the trade press, Jonathan Male (my boss at DOE) will want to know if the trade press is correct is asserting there will be a three-month delay in EPA issuing its final ruling on the proposed 2014 RVO rule?

Any advice on what I should tell Jonathan?

Much thanks, Howard

p.s. You can call me if that is easier....

Howard S. Marks

Senior Policy Analyst

Energetics, Inc.

Contractor to the U.S. Department of Energy

Bioenergy Technologies Office
Washington, DC

office: 202-289-2742

cell: Ex. 6 - Personal Privacy

To: Dr. Robert Graham[Rgraham@ensyn.com]
From: Argyropoulos, Paul
Sent: Mon 6/9/2014 11:17:49 AM
Subject: RE: RFS2-Qualified Woody Biomass

Hi Bob,

I'm trying to check in with a few people on this. I'll get back with you later.

The key here is the renewable biomass definition. It appears the language focuses on residues from actively managed tree plantations.

WRT the November 2010 rule, the language you highlight is ***"Wood chips and wood waste"***.

I'm pretty sure we won't be able to tackle the "wood waste" issue. As far as wood chips, that may or may not be easier.

WRT the analysis section, that's what I'm checking into. Again, the analysis use of terms doesn't necessarily link it back or provide direct support back to what is allowed in the definition of renewable biomass. I'm try to see why they used those terms and products in the analysis.

There's a couple ways to proceed but for now I'm going to see if I can get some background on the language from a couple team members.

Beyond that, my direction would likely be to very succinctly lay out exactly what you are using (feedstock names) and where it is coming from (mill, other) for the records for registration and for the required producer feedstock records.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Dr. Robert Graham [mailto:Rgraham@ensyn.com]

Sent: Thursday, June 05, 2014 8:49 AM

To: Argyropoulos, Paul

Subject: RE: RFS2-Qualified Woody Biomass

Thanks Paul,

I have tried not to be too wordy, but here is a cut and paste from one of our internal reviews. There are three references:

1. The RFS2 Regulations
2. The Direct Final Rule of November 2010
3. The RFS2 Regulatory Impact Analysis

Excerpts are taken from all three documents(see below), but perhaps the key citation for us is from the Regulations *proper*, page 14695: “Therefore EPA is expanding the definition of *tree residue* to *include residues* from processing planted trees at *lumber and paper mills*”

Best Regards,

Bob

1. **RFS2 Regulations**

“**Tree residue**” and “**actively managed tree plantations**” are the two terms that are of prime importance to Ensyn when determining qualified biomass for RTP projects

1. Executive Summary (p14681):

The Renewable biomass limits the type of biomass and the land from which it must be harvested.

Seven types of approved renewable biomass within the original RFS:

- i. Planted crops and crop residues from land that was cleared prior to Dec.19, 2007
- ii. Planted trees and ***tree residue*** (emphasis mine) from tree plantations that were cleared prior to Dec. 19/07
- iii. Animal waste material and byproducts
- iv. Slash and pre-commercial thinnings from non-federal forestlands, non “old-growth” and non-“critically-imperiled” (State Natural Heritage Program)
- v. Biomass cleared from the vicinity of buildings and other areas, that pose a risk of wildfire
- vi. Algae
- vii. Separated yard and food waste

Notes:

- Categories i, ii, iv, and vii relate to Ensyn projects on the short-term, and ii, & iv. are of particular interest
- Definitions are clarified in the regulations and in subsequent Final Rule publications.
- The words in the above categories cannot be taken at face value since the Regulations and Definitions provide precise descriptions and inclusions (in Ensyn's favor)
- The time/date constraint, coinciding with the date of the initial RFS legislation, is included in the regulations so that the RFS program would not artificially cause new cropland or new forestry operations to come into production (at the expense of virgin non-developed lands)

Description of Regulatory Provisions

This section includes an interpretation and clarification of the definitions of renewable biomass (pp. 14694 – 14695) :

ii. Planted Trees and Tree Residues

- Includes planted trees and ***tree residue*** from ***actively managed tree plantations*** on non-federal land (14694)
- ***Actively managed tree plantations*** is not an overly restrictive term as may be suggested. EPA's definition is "*a stand of no less than 1 acre composed primarily of trees established by hand- or machine-planting of a seed or sapling or by coppice growth from a stump or root of a planted tree that was hand-or machine-planted*" (14694)
- A further clarification is that "***silvicultural programs such as those of the Forest Stewardship Council (FSC) ... indicate actively managed tree plantations.***" (14694)
- EPA's final definition of ***Tree Residue*** is "slash and ***any woody residue generated during the processing*** of planted trees from actively managed tree plantations for use in ***lumber, paper and furniture or other applications*** (14695)
- EPA agrees that the term should "include woody residue from sawmills and paper mills that process planted trees". "Therefore EPA is expanding the definition of ***tree residue*** to ***include residues*** from processing planted trees at ***lumber and paper mills***" (14695)

Definitions Section (new definitions within RFS2) pp. 14864 – 14866

Tree Plantation is a stand of no less than 1 acre composed primarily of trees established by hand- or machine-planting of a seed or sapling or by coppice growth from a stump or root of a planted tree that was hand- or machine-planted. Tree plantations must have been cleared prior to December 19, 2007 and must have been actively managed on December 19, 2007 ...

Tree Residue is slash and any woody residue generated during the processing of planted trees from tree plantations for use in lumber, paper and furniture or other applications, provided that such woody residue is not mixed with similar residue from trees that do not originate in tree plantations.

2. RFS2 Direct Final Rule November 23, 2010

This direct final rule was issued primarily to re-adjust the obligated volumes for cellulosic biofuel in 2011. As part of this ruling, EPA describes by what technologies, and from what types of cellulosic biomass, future cellulosic biofuel volumes will likely be produced.

Some examples of cellulosic biomass that they cite in the cellulosic biofuel technologies case studies:

1. “Waste cellulose stream from paper recycling” p.15
2. ***“Wood chips and wood waste” p.15***
3. “Separated MSW” p.17
4. The only types of wood that are currently allowed as a valid feedstock” (*Note: among the Forest Fuel wood feedstocks*) “are those derived from various types of waste”

3. Renewable Fuel Standard Program (RFS2) Regulatory Impact Analysis

February 2010

One of the objectives of this Analysis is to quantify the environmental impact of the use of various approved renewable fuels under the RFS2 regulations. Various wood residues are explicitly included in this Analysis (note, it is always assumed that the woody renewable fuels originate from actively managed forests):

Wood Residues (p.33)

1. Forestry Residues (p. 34)

- Logging residues (tops of harvested trees, unwanted trees knocked down or left on site)
- Other removals
- Fuelwood
- Fuel treatment wood

2. Primary and Secondary Mill Residues (p.34-35)

- Residues of harvested wood from forests converted into consumer products at processing mills
- Primary mills convert roundwood products into other wood products, including sawmills, pulp mills, veneer mills, etc.
- Secondary mills use the products from primary mills to make other products
- Includes barks, slabs, edgings, sawdust and peeler residue

3. Urban Wood Residue

- MSW and C&D
- MSW includes yard trimmings

- C&D includes relatively clean new construction waste and more contaminated cellulose from the demolition of older buildings

4. Forest Thinnings

- Dense growth in mature forests and residues in these forests that arise from natural decay

Additional references to the use of woody mill residues in the context of the RFS2 program are scattered throughout the document:

- Resources such as primary and secondary mill residues and urban wood residues are already collected at the processing facility and it seems probable that some of the cellulosic facilities could be co-located ... (p.35)
- Additional forest residue is available downstream of the logging operations at mills ... primary processing mills ... secondary processing mills (p.39)
- MSW (p.49)
- C&D (p.52)
- Another potential source of feedstock that may be converted into *cellulosic biofuel* are *wood residues*. This category of feedstock refers to a large range of currently unused wood wastes from forestry and wood processing industries ... mill residues, forest residue and forest thinning. (pp. 81-82)

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]

Sent: June 4, 2014 11:42 AM

To: Dr. Robert Graham

Subject: RE: RFS2-Qualified Woody Biomass

Hi Bob.

A couple quick things. While mill residues are mentioned in the preamble, I think they are only in the context of lifecycle, and not clearing in the context of whether they are “renewable biomass”. Not sure they are clearly an approved feedstock. I couldn’t find anything directly noting that mill residues are wastes, nor MSW. If you have specific language, references that make both or either of these interpretations clear, let us know and we can look at them.

WRT the co-mingling request, you can submit a request and it will get assigned to someone for response. As noted before, it is not likely any evaluation or determination on that issue will be easy nor timely. We’ve had a long history of conversations on similar issues in the feedstock world, including mass balancing and they have not resulted in any change to the regulations nor any difference in interpreting the existing regs in a way that would allow for it. Just being totally clear on the history of this.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Dr. Robert Graham [<mailto:Rgraham@ensyn.com>]

Sent: Wednesday, June 04, 2014 11:21 AM

To: Argyropoulos, Paul

Subject: RE: RFS2-Qualified Woody Biomass

Thanks Paul –

It is not about co-mingling (although we want to solve that issue!). It is about secondary mill residues (not primary residues such as slash, thinnings, forest residuals).

The RFS2 Regulations/Rules seem to suggest (and the commentary in the preamble and text seems clear), that secondary mill residues are “wastes” and therefore treated like MSW cellulosics, for example. These secondary residues are less expensive than forest/plantation residuals (slash, thinnings, etc.), so clarity before we contract the biomass would be helpful.

A secondary question, can we begin the co-mingling process with someone at EPA. i.e., those situations where we know that x% (say 95% by way of example) is definitely FSC or SFI-certified forest-managed biomass? Enormous amounts of otherwise-qualified (ie., non-federal, forest-managed) RFS2 cellulosic biomass is largely underutilized by the major fiber suppliers

With regards,

Bob

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]
Sent: June 4, 2014 10:53 AM
To: Dr. Robert Graham
Subject: RE: RFS2-Qualified Woody Biomass

Hi Bob,

I’m not sure who to direct you to on that one. Many of us have played in that area for some time now. It’s likely still best to send in your questions to the support team (support@epamts-support.com) and they can coordinate getting with the appropriate team members and get a

response to you. If this is the issue with co-mingling of certified feedstocks and feedstocks from federal lands, don't expect a quick response. It's been hanging out there for a while.

Hope you are feeling better.

Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

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Web: www.epa.gov

From: Dr. Robert Graham [<mailto:Rgraham@ensyn.com>]

Sent: Tuesday, June 03, 2014 6:46 PM

To: Argyropoulos, Paul

Subject: RE: RFS2-Qualified Woody Biomass

Paul,

Is there a warm body at EPA who is a resident expert on qualified woody biomass that we could chat with informally?

Bob

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]
Sent: May 21, 2014 9:55 AM
To: Dr. Robert Graham
Subject: RE: RFS2-Qualified Woody Biomass

Hi Bob.

Please send you specific inquiry to our support line: support@epamts-support.com

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Dr. Robert Graham [<mailto:Rgraham@ensyn.com>]
Sent: Wednesday, May 21, 2014 9:50 AM

To: Argyropoulos, Paul
Subject: RFS2-Qualified Woody Biomass

Hi Paul,


Quick question. Who would we call at EPA to get some counsel on qualified wood feedstocks and residues? We have assumed that SFI or FSC certified wood from non-federal lands is good, but would like some clarity as we proceed with facility registrations.

Best Regards,

Bob

To: Michael.McAdams@hklaw.com[michael.mcadams@hklaw.com]
From: Argyropoulos, Paul
Sent: Fri 6/6/2014 6:28:28 PM
Subject: Fw: 2013 RFS Compliance Deadline Extended to September 30, 2014

Paul Argyropoulos
Senior Policy Advisor
US EPA
Office of Transportation and Air Quality
Mobile: Ex. 6 - Personal Privacy

A large black rectangular redaction box covering several lines of text.

Dear Interested Parties:

EPA is taking final action to extend the compliance deadlines for the 2013 renewable fuel standards (RFS). The new deadlines are September 30, 2014 for obligated parties to submit compliance reports to EPA, and January 30, 2015 for submission of third party verification reports. EPA is extending these deadlines to assist industry with managing their compliance with both the 2013 and 2014 renewable fuel standards. EPA intends to issue the 2014 volume standards in the near future.

For more information: <http://epa.gov/otaq/fuels/renewablefuels/regulations.htm>

Regards,

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

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Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

To: Larry Schafer[lschafer@biodiesel.org]
From: Argyropoulos, Paul
Sent: Tue 6/3/2014 1:12:40 PM
Subject: RE: How is your week looking ...

Hi Larry,

The week is looking very bad. Maybe we can chat by phone tomorrow, in the morning.

WRT the board meeting, we will have to take a pass. There isn't anything that can be said at this point. You can express our thanks for the invite, let everyone know we'll look to participate next go round but we have all hands on deck working on the backlog of work, RFS related and otherwise. Heck, I'm even having to take on helping with our response to comments document, which I've never had to do in the past.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Larry Schafer [mailto:lschafer@biodiesel.org]
Sent: Tuesday, June 03, 2014 8:41 AM
To: Argyropoulos, Paul
Subject: How is your week looking ...

Paul,

Can you fit me in for 15 minutes this week?

Also,

We would like you to speak to the National Biodiesel Board's Board of Directors Meeting on the Morning of Wednesday June 18, 2014.

We know you won't be able to say much if anything ... but we would like to continue the ongoing respectful discussion, tradition and relationship you have built with the National Biodiesel Board.

Let me know if you can make that work.

Thanks

Larry Schafer

National Biodiesel Board

O: 202.737.8801

M: Ex. 6 - Personal Privacy

LSchafer@Biodiesel.org

Biodiesel – America's Advanced Biofuel!

www.americasadvancedbiofuel.com

1331 Pennsylvania Ave. NW

Suite 505

Washington DC 20004

To: Markowitz, Kenneth[kmarkowitz@akingump.com]
From: Argyropoulos, Paul
Sent: Mon 5/19/2014 4:32:48 PM
Subject: RE: Lanzatech Follow-up

Thanks Ken. As noted during our conversation, we're not likely to be able to engage in any discussions for at least a month or so – maybe longer. With that being said, after reading this I'm confused by the approach. I don't have time to elaborate on this right now but the basics presented in this aren't reflective of our previous conversations or assumptions with LanzaTech. We've nibbled around all facets of whether the bacteria is the biomass, the process etc. etc. etc. and around what is feeding the biomass or the process etc. etc. etc. Bottom line, we aren't in a position to torture interpretations to try to make things work. For now, I'm going to point you to the announcement we may a couple months back -- <http://www.epa.gov/otaq/fuels/renewablefuels/documents/420f14011.pdf> -- and to have you look towards that as to where we are, what we are trying to do, look at the priorities and have you see if / how your thinking aligns with the principles.

We can look to set up a time to chat in the next month or so.

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

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Web: www.epa.gov

From: Markowitz, Kenneth [mailto:kmarkowitz@akingump.com]

Sent: Friday, May 16, 2014 1:02 PM
To: Argyropoulos, Paul
Subject: Lanzatech Follow-up

Hi Paul,

Per your request in advance of our next conversation, I am providing further background on the new approach that Lanzatech has developed to qualify for a Renewable Fuel Standard (RFS) pathway.

LanzaTech greatly appreciates EPA's efforts thus far toward approving a pathway for its proprietary organism and waste emission fermentation process. To date, those deliberations have focused on the definition of renewable biomass. It is our understanding that the major obstacle preventing EPA from confirming the LanzaTech bacteria as renewable biomass related to other bacterial processes, which rely on natural gas as a source of carbon for growth, from potentially falling through the cracks into the RFS.

With this in mind, Lanzatech has reviewed the totality of the provisions governing the RFS in developing a legally defensible approach that assures blockage of any such unintended consequences. This approach relies on the RFS definition of "renewable fuel" to prevent biological processes that utilize a fossil fuel (*e.g.*, natural gas) as a source of carbon from generating Renewable Identification Numbers (RINs.) We have been engaging key stakeholders from the environmental community to test and strengthen this approach for a Lanzatech pathway that removes any concerns related to our biomass and fossil fuels.

In summary:

- LanzaTech produces “renewable fuel” that replaces or reduces the quantity of fossil fuel present in transportation fuel, heating oil or jet fuel by utilizing waste emissions that are generated from industrial processes and frequently are flared or vented to the atmosphere. 42 U.S.C. § 7545(o)(J); 40 C.F.R. § 80.1401. A process that utilizes natural gas, a fossil fuel, to grow similar biomass for the production of transportation fuels does not qualify as “renewable fuel” under the RFS because such processes simply transform one form of fossil fuel into another, rather than replace or reduce it as required by statute. In our initial proposed pathway, these genuine waste gasses are emitted from a basic oxygen furnace (BOF) in steel making.

- LanzaTech’s propriety organism, which is derived from animal waste/byproducts, is “renewable biomass” in accordance with the RFS. 42 U.S.C. § 7545(o)(I); 40 C.F.R. § 80.1401. This is consistent with EPA regulatory interpretations of the definition of “renewable biomass,” specifically with regards to cyanobacteria and planted crops seeded in tanks, and in its similarity to algae. Like cyanobacteria and algae, LanzaTech’s organism uses inorganic carbon to grow. Thus far, we have received no pushback or expressions of concern from the environmental community on this issue.

- LanzaTech “renewable fuel” is an advanced biofuel because it reduces life cycle greenhouse gas emissions (GHG) by greater than 50 % over the transportation fuel, heating oil and jet fuel that it replaces. 40 C.F.R. § 80.1401. LanzaTech’s renewable fuel qualifies for the generation of the appropriate RINs based on Life Cycle Analysis (LCA) and compliance with the other RFS requirements. 40 C.F.R. § 80.1426. [Note under certain conditions the LCA GHG reductions may be significantly greater than 50%.]

Update on Commercialization

Lanzatech is making significant progress toward commercialization of its technology in the United States. After successful demonstration in China, LanzaTech is now actively pursuing projects in the US, with the potential to make a meaningful near-term contribution to US advanced biofuel targets. LanzaTech

currently is developing a commercial project with a global steel producer at a steel mill in the Midwest area, where LanzaTech proposes to apply its microbial gas conversion technology to the basic oxygen furnace (BOF) off-gases for ethanol production. The project feasibility analysis is underway, and is expected to be complete in early June 2014. After a successful feasibility study, the project would proceed to engineering phases of development, in which the project is refined, allowing for more accurate costing. Preliminary estimates show that the project would produce significant volumes of advanced biofuel annually. LanzaTech's engineering partner and steel shop technology provider for this effort is one of the largest and most globally recognized engineering/technology companies in the world.

My schedule is flexible next week, so please suggest some convenient times for you to speak.

Thanks for your consideration,

Ken

Kenneth Markowitz | Consultant

AKIN GUMP STRAUSS HAUER & FELD LLP

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To: Michael.McAdams@hklaw.com[Michael.McAdams@hklaw.com]
Cc: kjm@earthpace.com[kjm@earthpace.com]
From: Argyropoulos, Paul
Sent: Wed 5/14/2014 1:55:27 PM
Subject: RE: ABFA Co Location Letter to send to EPA

Thanks Mike.

Referring to bio-intermediates in general is our generic term for the disconnect between having a product from an approved pathway and the disconnect between where the processing steps occur, which is essentially the co-location issues.

So this is the language you are referring to: “At this time, however, cellulosic RINs would not be able to be generated for any fuel produced using Sweetwater Energy’s cellulosic sugars since the existing RFS registration regulations were not designed to allow the subdivision of processes between multiple facilities. Until this is resolved, fuel production processes of this type will not be able to generate RINs. We therefore have not included any volume from Sweetwater Energy in our projections of cellulosic biofuel for 2014.”

We will discuss and prepare a response, but as you know we’ve been discussing this / these issues for quite some time and I don’t believe that just because the issue was mentioned in the case of Sweetwaters situation enables us to take on this issue in the final rule, which as you know is highly complex, variable in terms of the bio-intermediate / co-location issues, and there may be some notice and comment issues we’d have to explore as well. That being said, we’ll give you letter and thoughts a complete look and explore what options there maybe.

Thanks for the clarity.

Take care, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: Ex. 6 - Personal Privacy

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Michael.McAdams@hkllaw.com [mailto:Michael.McAdams@hkllaw.com]

Sent: Wednesday, May 14, 2014 9:25 AM

To: Argyropoulos, Paul

Cc: kjm@earthpace.com

Subject: RE: ABFA Co Location Letter to send to EPA

Paul,

We are confused by your question regarding bio-intermediates. Our letter focuses solely on the issue of co-location of processes. This issue of “the subdivision of processes between multiple facilities” was raised in the context of Sweetwater Energy in the 2014 RVO proposed rulemaking at 78 Fed. Reg. 71732, 71743 (No. 29, 2013.)

Could you help me better understand exactly what you are referring to? Happy to put together an answer.

Thanks

Michael McAdams | Holland & Knight

President, ABFA

Sr Policy Advisor

800 17th Street, NW Suite 1100 | Washington DC 20006

Phone 202.469.5140 | Fax 202.955.5564

michael.mcadams@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

From: Argyropoulos, Paul [<mailto:Argyropoulos.Paul@epa.gov>]

Sent: Wednesday, May 14, 2014 6:49 AM

To: McAdams, Michael J [Ex. 6 - Personal Privacy]

Subject: RE: ABFA Co Location Letter to send to EPA

Hi Mike. Can you please let me know what section of the preamble you are referring to regarding biointermediates?

Thanks, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

Phone: 202-564-1123

Mobile: [Ex. 6 - Personal Privacy]

Email: argyropoulos.paul@epa.gov

Web: www.epa.gov

From: Michael.McAdams@hklaw.com [<mailto:Michael.McAdams@hklaw.com>]
Sent: Tuesday, May 13, 2014 2:53 PM
To: Grundler, Christopher
Cc: Argyropoulos, Paul; Simon, Karl; Machiele, Paul; gjohnston@gevo.com
Subject: FW: ABFA Co Location Letter to send to EPA

Chris: I want to thank you and your team for the discussions surrounding the co-location/intermediate feedstocks issues currently under discussion. Our Association has drafted the attached letter with suggestions as a follow up to our thoughtful meeting for further consideration. Wishing you all the best,

Michael McAdams | Holland & Knight

President, ABFA
Sr Policy Advisor
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To: Lie, Sharyn[Lie.Sharyn@epa.gov]; Melinda Tomaino[tomainom@agc.org]
From: Argyropoulos, Paul
Sent: Tue 5/13/2014 12:08:49 PM
Subject: RE: Speakers: Location and where to go onsite at AGC's CEC

Hi Melinda,

Feel free to ring me or email me and I'll see if we can work out the logistics for me to participate.

Regards, Paul

Paul Argyropoulos

Senior Policy Advisor

US EPA

Office of Transportation and Air Quality

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Web: www.epa.gov

From: Lie, Sharyn
Sent: Monday, May 12, 2014 5:40 PM
To: Melinda Tomaino
Cc: Argyropoulos, Paul
Subject: RE: Speakers: Location and where to go onsite at AGC's CEC

Melinda-

Based on our conversation, I believe Paul Argyropoulos in my office would be in a better position to provide more of an overview of the RFS program for your audience. I have mentioned this conference to him and I believe he will be able to participate, but he will still need to confirm availability.

Cheers,

Sharyn

From: Melinda Tomaino [<mailto:tomainom@agc.org>]
Sent: Monday, May 12, 2014 5:38 PM
To: Melinda Tomaino
Cc: Leah Pilconis
Subject: Speakers: Location and where to go onsite at AGC's CEC

Dear CEC Speakers:

AGC's 2014 Contractors Environmental Conference is four weeks away on June 12-13. I want to be sure you have all the information you need! This week, it's all about the location.

Conference Location*

All events will be held on the **2nd Floor** at the

Renaissance Arlington Capital View
2800 S Potomac Avenue
Arlington, VA 22202

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www.marriott.com/waspy

Check-in

Check-in at the registration area at least 30 minutes prior to your session. If you're already registered and attending the conference, be sure to be at your session room a little early to make sure everything is as it should be, perform a quick presentation check, meet your session's Steering Committee volunteer

and fellow speakers if speaking on a panel.

The CEC will be held in the meeting rooms along the front of the hotel on the 2nd Floor. Registration is outside Studio B. A hotel map is included in the most recently updated [schedule](#).

Contacting Staff Onsite

If you have questions onsite, please try the staff at the registration area on the 2nd Floor. There also will be several staff onsite, with staff ribbons on their badges, who can help. If you need to reach me, my personal cell-phone number is 202-380-7008 for use June 11, 12 and 13. If you have questions beforehand, please contact me at the office: 703-837-5415.

Session Room Assignments

We've updated the schedule to include the room assignments, including a map of the 2nd floor of the hotel. Click here to check out the updated [schedule](#).

Next week, the conference audio/visual package and your request for any additional A/V equipment.

Best Regards,

Melinda Tomaino

*Please note the correct hotel address above. There was an unfortunate typo on 5/2/2014 email---and I don't want you to go to the hotel across the street!

Melinda L. Tomaino, LEED® AP
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Arlington, VA 22201

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